

Federal Defenders
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Attorney-in-Charge

May 10, 2024

BY ECF

Hon. Judge Analisa Torres
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: **United States v. Devonte Delbas**
21 Cr. 106 (AT)

Dear Judge Torres,

Devonte Delbas, through undersigned counsel, respectfully requests a bail modification to permit him to leave his home on Sunday, May 12 to go to dinner and the movies with his mother in celebration of Mother's Day and his birthday (May 12).

Mr. Delbas was released on April 3, 2024, on a \$20,000 Personal Recognizance Bond, co-signed by 1 financially responsible person (his mother), with travel restricted to the Southern and Eastern districts of New York, home detention, and supervision under Pre-Trial Services. Mr. Delbas has also been referred for substance abuse treatment at SCAN- Harbor, in the Bronx.

This Sunday is Mother's Day. It also happens to be Mr. Delbas's 26th birthday. Mr. Delbas would like to spend time with his mother outside of the home (but still in the Bronx) in celebration of Mother's Day and his birthday. He requests permission to leave the home between 3:00 PM and 9:00 PM to go to dinner and the movies with his mother and siblings.

Probation objects to this modification, citing recent issues of non-compliance with location monitoring and truthfulness with officers about his whereabouts. The

Government defers to Probation. The Court should grant this modification over Probation's objection and allow Mr. Delbas to celebrate Mother's Day and his birthday with his family outside of the home. Spending time with his family outside of the home is a positive use of his time and critical to helping him maintain and strengthen relationships with his family.

Moreover, while there have been setbacks on Probation, Mr. Delbas has also shown progress. Mr. Delbas attended group therapy at SCAN- Harbor on May 9, 2024. He is scheduled for a makeup session with his individual therapist on May 10, 2024 (she was sick earlier this week and had to reschedule). He reported in person to Pretrial and Probation on Tuesday, May 7. Later this month, he has appointments scheduled with STRIVE, an employment program, and GOSO, a reentry program, so that he can connect to more services. He is eager to engage in every one of these services so that he has the tools to improve his experience on Probation and facilitate his successful reentry and rehabilitation.

For the reasons above, I ask that the Court temporarily modify Mr. Delbas's home detention condition so that he may spend time with his family outside of his home on Mother's Day and his birthday, Sunday, May 12. I specifically request that he be permitted to leave the home at 3:00 PM and required to return home by 9:00 PM.

Respectfully submitted,

/s/ Zawadi Baharanyi

Zawadi Baharanyi
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GRANTED.

SO ORDERED.

Dated: May 10, 2024
New York, New York



ANALISA TORRES
United States District Judge